

**From:** [WARD, LA WEEDA](#)  
**To:** [Vianne Setiadi](#); [R9AirPermits\\_SC](#)  
**Cc:** [Danny Luong](#); [Khang Nguyen](#); [Bhaskar Chandan](#); [Rafik Beshai](#); [Sawsan Andrawis](#); [Lisa Wong](#); [Rios, Gerardo](#)  
**Subject:** RE: Proposed Significant Revisions to Title V Facility Permits- Tesoro Refining & Marketing Co. LLC.  
**Date:** Tuesday, April 19, 2016 11:14:17 AM

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Thank you for the opportunity to review Proposed Significant Revisions to Title V Facility Permits - Tesoro Refining & Marketing Co. LLC. EPA offers the following comments on the proposed revisions:

1. Please provide a spreadsheet detailing an accounting of emissions increases exempted pursuant to Rule 1304 (c) (2) and/or planned use of ERCs across the various permit applications that make up the Los Angeles Refinery Integration and Compliance (LARIC) project. This spreadsheet should include all previous and future application submittals that make up the LARIC for which emissions increases are offset or exempt.
2. An example of why creation of the above spreadsheet is important can be found on page 19 of the engineering evaluation for the planned modification to the Hydrotreater Unit #4. In evaluating the Rule 1303 (b)(2) offsets required provision, the district specified an offset exemption allowed under Rule 1304(c)(2). Rule 1304 (c)(2) allows an offset exemption for a "Concurrent Facility Modification" that results in a net emissions decrease that occurs after the date of application submittal for a permit to construct but before the operation of the source. It is indicated that the planned future shutdown of the Wilmington Fluid Catalytic Cracking Unit (FCCU) will provide the needed 5.5 lbs/day of internal VOC offsets through a concurrent facility modification reduction. Although the submittal does indicate that the Wilmington FCCU shut down is planned for April/May 2017, there is no indication in the district's submittal that the startup of the modified Hydrotreater unit will occur after the FCCU shutdown as required per Rule 1304 (c)(2).

Please contact me know if you have questions or need to discuss.

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**From:** Vianne Setiadi [<mailto:vsetiadi@aqmd.gov>]

**Sent:** Tuesday, March 08, 2016 5:58 PM

**To:** [R9AirPermits\\_SC](#)

**Cc:** [Danny Luong](#) ; [Khang Nguyen](#) ; [Bhaskar Chandan](#) ; [Rafik Beshai](#) ; [Sawsan Andrawis](#) ; [Lisa Wong](#)

**Subject:** Proposed Significant Revisions to Title V Facility Permits- Tesoro Refining & Marketing Co. LLC.

**Facility Name:** Tesoro Refining & Marketing Company

**Facility ID:** 800436

**Address:** 2101 E. Pacific Coast Highway, Wilmington, CA

**Facility Name:** Tesoro Refining & Marketing Company, LLC (L.A. Refinery-Carson Operations)

**Facility ID:** 174655

**Address:** 2350 E. 223<sup>rd</sup> St., Carson, CA

**Type of Mod:** Proposed Significant Revisions to Title V Facility Permits

Application No.	Equipment	Description
567643	No. 51 Vacuum Distillation Unit	Modifications to diesel collection trays by installing of a new 16-inch nozzle and replacing the top six layers of Diesel PA Bed Packing; additions of new heat exchangers, strainers and electric pumps,.
567645	No. 1 Light Hydrotreating Unit	Modifications to Stabilizer Column RPV 3012, Stabilizer Reboiler RPV 3011, Overhead Accumulator RPV 3013, heat exchangers and feed pumps; additions of a stabilizer product coalesce, condensers and heat exchangers, and connecting a pressure safety valve to gas recovery system controlled by the Hydrocracker Flare.
		Modifications by re-purposing equipment currently in

567646	Naphtha HDS Unit	service in the Iso-Octene Unit for service in the Naphtha Hydrodesulfurization Unit; additions of heat exchangers and condensate pumps, and connecting pressure safety valves to gas recovery system controlled by the No. 5 Flare.
567647	C4 Alkylation Unit	Modifications by installing a new Amylene Feed Coalescer (RW 7184-289.02), heat exchangers and pumps; and re-traying Debutanizer Tower (RPV-843) with newly designed trays, and connecting a pressure safety valve to gas recovery system controlled by the South Area Flare.
567648	LPG Railcar Loading/Unloading Rack	Modifications by installing a surge drum, a knockout pot, a vaporizer and pumps and connecting a pressure safety valves to gas recovery system controlled by the No. 5 Flare.
567649	No. 51 Vacuum Unit Heater	Change of equipment description for No. 51 Vacuum Unit Heater to increase the heat input rating from 300 MMBtu/hr to 360 MMBtu/hr, with no physical modification.
575837	Refinery Interconnection System	New construction of an above-ground and underground pipe bundle to connect the operations between the Carson and Wilmington sites. New pressure safety valves will be connected to gas recovery system controlled by the South Area Flare.
575838	Iso-Octene System	Modifications by removing several vessels and repurposing them to serve the Naphtha Hydrodesulfurization Unit.
575839	No. 5 Flare System	Modifications to allow new connections of pressure safety valves serving the LPG Railcar Loading/Unloading Rack, Alkylation Unit and Naphtha HDS Unit.
575840	Hydrocracker Flare System	Modifications to allow a new connection of a pressure safety valve serving the No. 1 Light Hydrotreating Unit.
575841	South Area Flare System	Modifications to allow new connections of pressure safety valves serving the Alkylation Unit and new Refinery Interconnection System.
578248	Mid Barrel Desulfurizer Unit	Modification by installing "jump over" piping from the No. 1 Light Hydrotreating Unit to the Mid- Barrel Desulfurizer Unit
578249	Hydrocracker Unit – Fractionation Section	Modification by installing new heat exchangers and pumps to improve the heat recovery from jet fuel products and to better cool the fractionator bottoms.

Attachments:

1. EPA Cover Letter
2. Draft Permit – Tesoro – Wilmington
3. Draft Permit – Tesoro – Carson
4. Engineering Evaluation – Wilmington (3 evaluations)
5. Engineering Evaluation – Carson
6. Public Notices (English & Spanish)

Please call or email me if there is any problem with the transmission of the attached files.

Thank you.

Vianne Setiadi

SCAQMD

Engineering and Compliance

Refinery - Permitting

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